



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Donna Singleton, Treasurer
National Republican Congressional
Committee - Expenditures
320 First Street
Washington, DC 20003

APR 2 1997

Identification Number: C00075820

Reference: October Monthly Report (9/1/96-9/30/96)

Dear Ms. Singleton:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 21(a)(i), 21(a)(ii), 21(b), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Please clarify the purpose and nature of each of the receipts itemized on Schedule A line 15 of the Detailed Summary Page.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): "Meeting Expense". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule H3 discloses receipt of \$54,211.10 from your non-federal account for a fundraising event(s) which is listed as 100% non-federal on Schedules H2 and H4. A committee is permitted to pay the entire amount

**NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE -
EXPENDITURES
PAGE 2**

of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(i). However, a 100% non-federal fundraising event does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

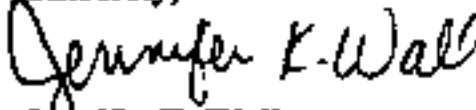
-Please note that the entries itemized on Schedule B supporting Line 23 M of the Detailed Summary Page need to be identified as in-kind contributions. Please amend your report to clarify this discrepancy.

-Transfers from your non-federal account for administrative expenses should be properly itemized on Schedule H3 supporting Line 18 i) of the Detailed Summary Page.

-Please note that 100% federal activity does not qualify as an allocable expense and should be itemized on a Schedule B supporting Line 21(b) of the Detailed Summary Page.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Jennifer K. Wall

Reports Analyst

Reports Analysis Division

